

KIRKLAND & ELLIS LLP  
 Robert G. Krupka, P.C. (S.B.N. 196625)  
 rkrupka@kirkland.com  
 Luke L. Dauchot (S.B.N. 229829)  
 ldauchot@kirkland.com  
 Ephraim D. Starr (S.B.N. 186409)  
 estarr@kirkland.com  
 777 South Figueroa Street  
 Los Angeles, California 90017  
 Telephone: (213) 680-8400  
 Facsimile: (213) 680-8500

Attorneys for Defendant-Counterclaimant  
 HONEYWELL INTERNATIONAL INC.  
 and Counterclaimant HONEYWELL  
 INTELLECTUAL PROPERTIES INC.

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION

TELEDYNE TECHNOLOGIES INC., a )  
 Delaware corporation, )

Plaintiff, )

vs. )

HONEYWELL INTERNATIONAL )  
 INC., a Delaware corporation, )

Defendant. )

HONEYWELL INTERNATIONAL )  
 INC. and HONEYWELL )  
 INTELLECTUAL PROPERTIES INC., )  
 a Delaware corporation, )

Counterclaimants. )

vs. )

TELEDYNE TECHNOLOGIES INC., a )  
 Delaware corporation, )  
 Counterdefendant. )

Case No. CV 06-06803

Assigned to: Hon. Margaret M. Morrow

**DECLARATION OF EPHRAIM D.  
 STARR IN SUPPORT OF  
 HONEYWELL'S MARKMAN  
 RESPONSIVE BRIEF**

Date: January 28, 2008

Time: 9:00 a.m.

Place: Courtroom 780

**DECLARATION OF EPHRAIM D. STARR**

I, Ephraim D. Starr, declare as follows:

1. I am a member of the Bar of the State of California and am a partner at Kirkland & Ellis LLP, attorneys of record for Defendant-Counterclaimant Honeywell International Inc. and Counterclaimant Honeywell Intellectual Properties Inc. (collectively "Honeywell"). I submit this declaration on the basis of personal, firsthand knowledge in support of Honeywell's *Markman* Responsive Brief, and if called upon to do so, would and could competently testify as follows:

2. A true and correct copy of Teledyne's Supplemental Preliminary Infringement Chart for the Presently Asserted Independent Claims of U.S. Patent No. 6,181,990 is attached hereto as Exhibit M.

3. A true and correct copy of U.S. Patent 6,047,165 is attached hereto as Exhibit N.

4. A true and correct copy of U.S. Patent 5,351,194 is attached hereto as Exhibit O.

5. A true and correct copy of a letter from Honeywell counsel Luke L. Dauchot to Teledyne counsel Frederick A. Lorig, dated October 31, 2007, is attached hereto as Exhibit P.

6. A true and correct copy of the file history of U.K. Patent Application No. 0323990.2, the U.K. counterpart to Teledyne's U.S. Patent 6,915,189, is attached hereto as Exhibit Q.

7. A true and correct copy of a document produced by Teledyne in this case as Bates numbers TDY0003057-3058 is attached hereto as Exhibit R.

8. A true and correct copy of a document produced by Teledyne in this case as Bates numbers TDY0003054-3056 is attached hereto as Exhibit S.

1           9.     A true and correct copy of a document produced by Teledyne in this case  
2 as Bates number TYD0085552 is attached hereto as Exhibit T. Honeywell has made  
3 repeated requests for the attachments to this email; Teledyne has not produced them  
4 but has agreed to continue its searches for them.

5           10.    A true and correct copy of excerpts from the file history of U.S. Patent  
6 6,477,152 are attached hereto as exhibit U. The excerpts include Honeywell's May  
7 13, 2002 Response to Office Action as well as the June 17, 2002 Notice of Allowance.

8           I declare under penalty of perjury under the laws of the United States of  
9 America that the foregoing is true and correct.

10          Executed this 17th day of December, 2007 at Los Angeles, California.

11  
12  
13                   By: /s/ Ephraim D. Starr  
14                   Ephraim D. Starr  
                    KIRKLAND & ELLIS LLP

15                   Attorneys for Defendant  
16                   HONEYWELL INTERNATIONAL INC.  
17                   and Counterclaimants  
                    HONEYWELL INTERNATIONAL INC.  
18                   and HONEYWELL INTELLECTUAL  
19                   PROPERTIES INC.  
20  
21  
22  
23  
24  
25  
26  
27  
28